

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

CLIFTON G JOSEPH  
BERNADETTE JOSEPH

Chapter 13

Debtor

Bankruptcy No. 20-13578-MDC

**OBJECTION OF CHAPTER 13 TRUSTEE  
TO CONFIRMATION OF PLAN OF DEBTOR(S)**

**AND NOW** comes, WILLIAM C. MILLER, ESQUIRE, chapter 13 standing trustee, to object to confirmation of the chapter 13 plan of debtor(s), because it fails to comply with 11 U.S.C. Sections 1322 and/or 1325 of the Bankruptcy Code, and/or debtor(s) has/have failed to provide information, evidence, or corrections to the petition, schedules, statements or other documents filed by debtor(s) to enable the standing trustee to evaluate the Plan for confirmation, as follows:

The Plan violates 11 U.S.C. Section 1325(a)(4) in that the value of the property to be distributed under the plan on account of each allowed unsecured claim is less than the amount that would be paid in a Chapter 7 liquidation.

The claims and/or claim amounts identified in the Plan are inconsistent with one or more filed proofs of claim. The Plan is underfunded in that the total filed proofs of claim which are to be paid through the Plan exceed the value of the Plan.

**WHEREFORE**, the standing trustee requests that the Court enter an order in the form annexed hereto denying confirmation of the Plan.

Respectfully submitted,

/s/ William C. Miller  
William C. Miller, Esquire  
Chapter 13 Standing Trustee